CLOVERDALE MONTESSORI SCHOOL (PWS #4010177) SOURCE WATER ASSESSMENT FINAL REPORT

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State of Idaho Department of Environmental Quality

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Executive Summary

Under the federal Safe Drinking Water Act Amendments of 1996, all states are required by the U.S. Environmental Protection Agency (EPA) to assess every source of public drinking water for its relative sensitivity to contaminants regulated by the act. The assessment for your particular system is based on a land use inventory of the designated source water area, sensitivity factors associated with each well, and characteristics of the aquifer that supplies your community with drinking water.

This report, Source Water Assessment for the Cloverdale Montessori School, located in Boise, Idaho, describes the public drinking water system, the boundaries of the zones of water contribution, and the associated potential contaminant sources located within those boundaries. This assessment should be used as a planning tool, taken into account with local knowledge and concerns, to develop and implement appropriate protection measures for this source. The results should <u>not be</u> used as an absolute measure of risk and they should <u>not be</u> used to undermine public confidence in the water system.

The Cloverdale Montessori School (PWS #4010177) drinking water system consists of a single well. Well #1 rated an overall high susceptibility to inorganic compounds (IOCs), volatile organic compounds (VOCs), synthetic organic compounds (SOCs), and microbial contaminants. This rating is due, in large part, to numerous potential contaminant sources located within the designated drinking water capture zone (Table 1, page 21).

The well has not recorded the presence of SOCs or VOCs during any water chemistry tests. However, routine bacteria tests have identified bacteria several times both in the well and within the distribution system. The presence of bacteria in the drinking water supply constitutes a public health threat. Therefore, if bacterial contamination continues to be a problem at the Cloverdale Montessori School, the system may want to investigate disinfection practices to protect the health of students and instructors at the school.

In addition, the system has recorded as arsenic level of 11 parts per billion (ppb), which would exceed the recently revised maximum contaminant level (MCL) for arsenic of 10 ppb. The EPA has recently lowered the MCL for arsenic from 50 ppb to 10 ppb (October 31, 2001), allowing public water systems until 2006 to comply. The system may want to take proactive measures in preparing for the new standard so compliance can be achieved by 2006.

Although contaminant levels in the drinking water system have never exceeded MCLs for any of the pollutants regulated under the Safe Drinking Water Act, the Cloverdale Montessori School should be aware that the potential for contamination still exists. The predominant land uses within the delineated region are urban and commercial. These areas are subject to ground water pollution from several sources, including storm water runoff, improper household hazardous waste disposal methods, and industrial pollution discharges, to name a few. These land uses collectively tended to increase the susceptibility scores for the Cloverdale Montessori School.

Furthermore, the drinking water capture zone resides within a DEQ designated Group 1 Priority Area for nitrates and the VOC perchloroethylene (perc). The water system may be subject to these contaminants since they are fairly prevalent in the region. The proximity of these areas, in turn, slightly increased the susceptibility scores.

This assessment should be used as a basis for determining appropriate new protection measures or reevaluating existing protection efforts. No matter what ranking a source receives, protection is always important. Whether the source is currently located in a "pristine" area or an area with numerous industrial and/or agricultural land uses that require surveillance, the way to ensure good water quality in the future is to act now to protect valuable water supply resources.

For the Cloverdale Montessori School, drinking water protection activities should first focus on continued maintenance of the sanitary seal and distribution system. Actions should also be taken to keep a 50-foot radius circle clear around the wellhead. If the system should need to expand in the future, new well sites should be located in areas with as few potential sources of contamination as possible, and the site should be reserved and protected for this specific use.

Any contaminant spills occurring on Cloverdale Drive should be monitored and dealt with expeditiously. Because a portion of the ground water capture zone is outside the direct jurisdiction of the Cloverdale Montessori School, the creation of partnerships with state and local agencies and industry groups are critical to the success of drinking water protection. Should microbial contamination continue to be a problem, appropriate disinfection practices would need to be implemented to ensure the health of the Cloverdale Montessori School residents.

The system may also want to further investigate any actions that need to be taken to achieve compliance with the new arsenic rule, effective in 2006. A proactive role will help to minimize complications in the future. Additionally, because the delineation passes through a Group 1 Priority Area for perc, the system may want to conduct additional monitoring for this pollutant. Perc has been linked with kidney and liver cancer in laboratory animals, and may be a human carcinogen.

Due to the time involved with the movement of ground water, drinking water protection activities should be aimed at long-term management strategies even though these strategies may not yield results in the near term. A strong public education program should be a primary focus of any drinking water protection plan, especially since the delineation contains some urban and residential land uses. Public education topics could include proper lawn care practices, household hazardous waste disposal methods, and the importance of water conservation to name but a few.

There are multiple resources available to help communities implement protection programs, including the Drinking Water Academy of the U.S. Environmental Protection Agency. In addition, because a transportation corridor (Cloverdale Drive) passes through the delineation, the Idaho Department of Transportation should be involved in any protection measures. Drinking water protection practices dealing with agriculture should be coordinated with the Idaho State Department of Agriculture, the Soil Conservation Commission, the Ada County Soil Conservation District, and the Natural Resources Conservation Service.

A community should incorporate a variety of strategies in order to develop a comprehensive drinking water protection plan, be they regulatory in nature (i.e. zoning, permitting) or non-regulatory in nature (i.e. good housekeeping, public education, water conservation, specific best management practices). For assistance in developing protection strategies please contact the Boise Regional Office of the Idaho Department of Environmental Quality at 373-0550 or the Idaho Rural Water Association at 1-800-962-3257.

SOURCE WATER ASSESSMENT FOR THE CLOVERDALE MONTESSORI SCHOOL, BOISE, IDAHO

Section 1. Introduction - Basis for Assessment

The following sections contain information necessary to understand how and why this assessment was conducted. It is important to review this information to understand what the ranking of this assessment means. A map showing the delineated source water assessment area and the inventory of significant potential sources of contamination identified within that area are contained in this report (Attachment A, pages 17-21). The list of significant potential contaminant source categories and their rankings used to develop the assessment is also attached.

Level of Accuracy and Purpose of the Assessment

The Idaho Department of Environmental Quality (DEQ) is required by the U.S. Environmental Protection Agency (EPA) to assess each drinking water source in Idaho for their relative susceptibility to contaminants regulated by the Safe Drinking Water Act Amendments of 1996. This assessment is based on a land use inventory of the delineated source water area, sensitivity factors associated with each well, and aquifer characteristics. Since there are over 2,900 public water sources in Idaho, there is limited time and resources available to accomplish the assessments. All of these assessments must be completed by May of 2003. An in-depth, site-specific investigation of each significant potential source of contamination is not possible. Therefore, this assessment should be used as a planning tool, taken into account with local knowledge and concerns, to develop and implement appropriate protection measures for this source. The results should not be used as an absolute measure of risk and they should not be used to undermine public confidence in the water system.

The ultimate goal of the assessment is to provide data to local communities to develop a protection strategy for their drinking water supply system. DEQ recognizes that pollution prevention activities generally require less time and money to implement than treatment of a public water supply system once it has been contaminated. DEQ encourages communities to balance resource protection with economic growth and development. The decision as to the amount and types of information necessary to develop a drinking water protection program should be determined by the local community based on its own needs and limitations. Drinking water protection is one facet of a comprehensive growth plan, and it can complement ongoing local planning efforts.

Section 2. Conducting the Assessment

General Description of the Source Water Quality

The Cloverdale Montessori School has a non-community non-transient public drinking water system serving approximately 50 people that is located in Ada County just west of Cloverdale Road between McMillan and Ustick roads in Boise, Idaho (Figure 1, Page 18). Residents receive their water from a single well.

The primary water quality issue currently facing the Cloverdale Montessori School is the recent presence of total coliform bacteria in the well. The latest incident of this nature occurred in September of 1999, when total coliforms were detected in a routine sample collected from the well bore. Two days, later, several repeat tests confirmed the initial results, detecting bacteria throughout the well and distribution system. The presence of bacteria in the drinking water supply constitutes a public health threat. Therefore, if bacterial contamination continues to be a problem at the Cloverdale Montessori School, then the system may want to investigate disinfection practices to protect the health of students and instructors at the school.

The water system has never detected any VOCs or SOCs during any water chemistry tests. The IOCs nitrate, arsenic, fluoride, and barium have all been discovered, but at levels below each respective MCL. Nitrate levels have been somewhat elevated, averaging 5.15 ppm since 1993. This is over 50 % of the allowable limit for nitrate, which is 10.0 ppm. However, nitrate levels have been relatively consistent and do not appear to be increasing at this time.

Additionally, in December of 1995, a routine test for arsenic revealed a concentration of 11 ppb. The EPA has recently lowered the MCL for arsenic from 50 ppb to 10 ppb (October 31, 2001), allowing public water systems until 2006 to comply. The system may want to take proactive measures in preparing for the new standard so compliance can be achieved by 2006. However, the latest test for arsenic in 1998 revealed a concentration of just 5 ppb, which would fall safely below the new MCL. The Cloverdale Montessori School may want to closely monitor these arsenic levels in the well to determine what actions, if any, need to be taken to remain in compliance. Recent documentation from the EPA would indicate that they plan to make monetary assistance available for small water systems to implement new engineering controls to reduce arsenic concentrations. More information can be found at the EPA web site (http://www.epa.gov).

Defining the Zones of Contribution – Delineation

The delineation process establishes the physical area around a well that will become the focal point of the assessment. The process includes mapping the boundaries of the zone of contribution into time-of-travel (TOT) zones (regions indicating the number of years necessary for a particle of water to reach a pumping well) for water in the aquifer. DEQ contracted with BARR Engineering to perform the delineations using a combination of MODFLOW and a refined analytical element computer model approved by the EPA in determining the 3-year (Zone 1B), 6-year (Zone 2), and 10-year (Zone 3) TOT for water associated with the Boise Valley aquifer. The computer model used site specific data, assimilated by BARR Engineering from a variety of sources including area well logs, the Treasure Valley Hydrologic Project, and hydrogeologic reports (detailed below in Section 3).

Identifying Potential Sources of Contamination

A potential source of contamination is defined as any facility or activity that stores, uses, or produces, as a product or by-product, the contaminants regulated under the Safe Drinking Water Act and has a sufficient likelihood of releasing such contaminants at levels that could pose a concern relative to drinking water sources. The goal of the inventory process is to locate and describe those facilities, land uses, and environmental conditions that are potential sources of ground water contamination. The locations of potential sources of contamination within the delineation areas were obtained by field surveys conducted by DEQ and from available databases.

It is important to understand that a release may never occur from a potential source of contamination provided best management practices are used at the facility. Many potential sources of contamination are regulated at the federal level, state level, or both to reduce the risk of release. Therefore, when a business, facility, or property is identified as a potential contaminant source, this should not be interpreted to mean that this business, facility, or property is in violation of any local, state, or federal environmental law or regulation. What it does mean is that the <u>potential</u> for contamination exists due to the nature of the business, industry, or operation. There are a number of methods that water systems can use to work cooperatively with these possible contamination sources, including educational visits and inspections of stored materials. Many owners of such facilities may not even be aware that they are located near a public water supply well.

Contaminant Source Inventory Process

A two-phased contaminant inventory of the study area was conducted in October and November of 2001. The first phase involved identifying and documenting potential contaminant sources within Cloverdale Montessori School source water assessment area (Figure 2a, page 19) through the use of computer databases and Geographic Information System maps developed by DEQ. The second, or enhanced, phase of the contaminant inventory involved contacting the system representative, Carol Dingwall, to validate the sources identified in phase one and to add any additional potential sources in the area.

The delineated source water area contains several potential sources of concern. Within the 3-year TOT zone, there are two businesses with enough pollutants on site to possibly affect ground water should something catastrophic occur. These two sites are a lawn maintenance company and a janitorial supply store. In addition, Cloverdale Drive transects Zone 1B, passing within approximately 300 feet of the well bore. Because Cloverdale Drive serves as an important transportation thoroughfare for the region, it was considered a possible source of contamination. Furthermore, parallel to Cloverdale Drive is a seasonal canal that supplies irrigation water during the growing season. According to the 1997 Ground Water Under Direct Influence (GWUDI) field survey, this canal is approximately 6 feet across and passes within 72 feet of the wellhead. Because this canal may contribute water to the Cloverdale Montessori School water system during the summer months, it was also regarded as a possible source of ground water pollution.

As the delineated drinking water capture zone nears the urban Boise area, more potential contaminant sources are encountered. Of these sites, the greatest cause for concern is a wastewater land application (WLAP Site) used for treating municipal sludge from a nearby mobile home park. This site may contribute SOCs and nitrates, which have the potential to leach into the vadose zone. All of the potential contaminant sources within the delineated drinking water capture zone are listed in Table 1 (page 21).

Section 3. Hydrologic Conditions of the Treasure Valley

Treasure Valley Hydrologic Project Information (Petrich and Urban, 1996; Neely and Crockett, 1998; Petrich et al., 1999)

The "Treasure Valley" is a geopolitical region that includes the lower Boise River sub-basin. The lower

Boise River sub-basin begins where the Boise River exits the mountains near the Lucky Peak Reservoir. From Lucky Peak Dam the lower Boise River flows about 64 (river) miles northwestward through the Treasure Valley to its confluence with the Snake River. The Treasure Valley Hydrologic Project area encompasses the lower Boise River area, and extends south to the Snake River. The southern area is included in the study area because of ground water flow from the Lower Boise River basin south toward the Snake River.

Significant amounts of desert area were converted to flood irrigated agriculture beginning in the 1860s. Irrigation led to increases in shallow ground water levels in some regions. These shallow ground water levels provided an inexpensive and readily obtainable source of water supply that is used extensively throughout the valley. Much of the population growth in the Treasure Valley has been occurring in previously flood-irrigated agricultural areas, resulting in increased pumpage and a reduction in local aquifer recharge. In addition, irrigation in some areas has become more efficient, reducing the amount of irrigation-related infiltration. Decreasing aquifer recharge and increasing pumpage is thought to be contributing to the decline of ground water levels in some areas.

The Treasure Valley experiences a temperate and arid-to-semiarid climate. Average high temperatures range from about 90°F in summer to 36°F in winter; low temperatures range from about 20°F in winter to about 56°F in summer. The average precipitation ranges from about 8 to 14 inches throughout most of the valley, most of which falls during the colder months in the form of snow in higher elevations and rain in the low-lying valleys.

Major surface water bodies include the Boise River, Lake Lowell, and Lucky Peak Reservoir. The primary source of surface water in the Treasure Valley is the high elevation area in the Boise River basin upstream of Lucky Peak Dam. Much of the spring runoff from the snow pack in high elevation areas is stored in three reservoirs: Anderson Ranch Reservoir, Arrowrock Reservoir, and Lucky Peak Reservoir.

Regional cropland is irrigated primarily with surface water through an extensive network of reservoirs and canals. The first canals were constructed in the 1860's; there are now over 1,100 miles of major and intermediate canals in the Treasure Valley, the majority of which are owned and maintained by canal companies and irrigation districts. Primary sources of irrigation water in the Treasure Valley include the Boise, Snake, and Payette Rivers.

Hydrogeology (from Petrich et al., 1999)

The lower Boise River sub-basin (Treasure Valley) is located within the northwest-trending topographic depression known as the western Snake River Plain. The western Snake River Plain is a relatively flat lowland separating Cretaceous granitic mountains of west-central Idaho from the granitic/volcanic Owyhee mountains in southwestern Idaho. The western Snake River Plain extends from about Twin Falls, Idaho northwestward to Vale, Oregon. The Snake River Plain is about 30 miles wide in the section containing the lower Boise River.

Historically, sediments originating from the surrounding mountains began accumulating on top of thick, basal basalts. Rifting and continued subsidence maintained the lowland topography, leading to the additional accumulation of water and sediments (Othberg, 1994). Basin infilling by sediments and basalt occurred from the late Miocene through the late Pliocene (Othberg, 1994). Incision caused by flowing water in major drainages (e.g., Snake and Boise Rivers) began in the late Pliocene or early

Pleistocene, although deposition of coarse sediments continued during Quaternary glaciations (Othberg, 1994).

Several Quaternary basalt flows have been described in the western Snake River Plain, and have been assigned to the upper Snake River Group (Malde, 1991; Malde and Powers, 1962). Lava flowed across portions of the ancestral Snake River Valley (Malde, 1991) in an area that is now south of the Boise River. The Snake River then changed course, incising at its present location along the southern margin of the basalt flows. More recent eruptions (from Kuna Butte and other local sources) spilled lava into the canyon south of Melba. The Snake River has since incised this basalt (Malde, 1991).

The general stratigraphy of the western Snake River Plain consists of (from top to bottom) a thick layer of sedimentary deposits underlain by a thick series of basalt flows, which in turn are underlain by older, tuffaceous sediments and basalt (Malde, 1991; Clemens, 1993). The upper thick zone of sediments (up to approximately 6,000 feet thick) distinguishes the western Snake River Plain from the eastern Snake River Plain, in which the upper section is primarily Quaternary basalt (Wood and Anderson, 1981).

The uppermost sediments and basalt belong to the Pleistocene-age Snake River Group. The Snake River Group consists of terrace sediments, Quaternary alluvium, and Pleistocene basalt flows (Wood and Anderson, 1981). Snake River Group sediments and basalts cover much of the project area (Othberg and Stanford, 1992).

The Snake River Group overlies the Idaho Group sediments. The Idaho Group sediments can be divided into two general parts (Wood and Anderson, 1981). The lower Idaho Group contains sediments described as lake and stream deposits of buff white, brown, and gray sand, silt, clay, diatomite, numerous thin beds of vitric ash, and some basaltic tuffs. The upper part of the lower Idaho Group also contains some local, thin, basalt flows. The upper Idaho Group consists of sands, claystones, and siltstones, but differs from the lower Idaho Group in that it contains a greater percentage of coarser-grained materials. The upper Idaho Group sediments are associated with a fluvial/deltaic/lacustrine depositional environment; the lower Idaho Group sediments were deposited in more of a lacustrine/deltaic environment (Wood, 1994).

Wood (1994) identified a buried lacustrine delta within the Idaho Group sediments in the Nampa-Caldwell area. The location of the delta in the middle of the western Snake River Plain suggests that the eastern part of the Boise River basin was delta plain and flood plain at the time of deposition, while the western part was a deep lake environment. The delta probably prograded northwestward into a lake basin 830 feet deep, based upon high resolution seismic reflection data and resistivity log interpretations. The delta-plain and front sediments were shown to be mostly fine-grained, well-sorted sand with thin layers of mud (Wood, 1994). The northwest trend of the delta indicates a sediment source to the southeast, such as where the Snake River flows today (Wood, 1994).

A substantial, laterally extensive layer of clay is found at depths of 300 to 700 feet below ground surface. The clay is important because it represents, in some areas, a significant aquitard separating shallow overlying aquifers from deeper zones. The clay, often described in well logs as having a blue or gray color, has been observed as far west as Parma, and as far east as Boise (although the clay is not found in the extreme eastern portions of the Treasure Valley). The clay varies from a few feet to a few hundred feet in thickness. Although significant layers of clay are present throughout the Idaho Group sediments, individual clay units are not necessarily continuous over large areas. Also, the top of the

clay can vary in elevation by up to approximately 200 feet in some locations, such as in an area west of Lake Lowell. In general, sediments above the "blue clay" are coarser-grained than the interbedded sands, silts, and clays underlying the "blue clay."

The top of the upper Idaho Group is marked in several parts of the Treasure Valley by a widespread fluvial gravel deposit known as the Tenmile gravels. Tenmile gravels contain rounded granitic rocks and felsic porphyries originating from the Idaho Batholith to the north and northeast. The Tenmile gravels range up to 500 feet in thickness along the Tenmile Ridge south of Boise, but are less than 50 feet thick in the Nampa-Caldwell area (Wood and Anderson, 1981).

Aquifer Systems and Hydrogeologic Characteristics

Ground water for municipal, industrial, rural domestic, and irrigation uses in the Treasure Valley is drawn almost entirely from Snake River Group and Idaho Group aquifers. Many domestic wells draw water from shallow aquifers, such as those in the Snake River Group deposits. Larger production wells (for municipal and agricultural uses) draw water from the deeper Idaho Group sediments.

Aquifers contained in the Snake River and Idaho Group sediments comprise shallow and regional ground water flow systems. Shallow aquifers contained in Snake River Group sediments and basalts may belong to local flow systems. Most local flow system recharge stems from irrigation infiltration and channel (e.g., streams or canals) losses. Discharge from shallow, local flow systems often is to local drains or streams. The time from recharge to discharge in shallow flow systems (residence times) probably ranges from days to tens of years.

In contrast, regional ground water flow systems extend much deeper than local flow systems. The Treasure Valley regional flow system begins in the eastern part of the valley, as indicated by downward hydraulic gradients in the Boise Fan sediments (Squires et al., 1992). Some water also enters the regional flow system as underflow from the Boise Foothills in the northeastern part of the valley. The regional flow system is thought to discharge primarily to the Boise and Snake Rivers in the western and southwestern parts of the valley.

Aquifer material characteristics, material heterogeneity, and structural controls influence Treasure Valley ground water flow. Coarse-grained materials (e.g., sand and gravel) in upper zones are more capable of transmitting ground water than fine-grained sediments (e.g., silt and clay). Clay and silt in the Snake River sediments can restrict vertical and/or horizontal ground water movement. Perched aquifers are created when fine-grained lenses impede downward vertical flow. A distinctive clay layer, sometimes referred to as "blue clay," is present over large portions of the valley. The clay is absent in the easternmost portions of the lower Boise River Basin, but can reach a thickness of more than 200 feet toward the central and western portions of the basin.

Sequences of interbedded sand, silt, and clay, such as the Deer Flat Surface and the upper portion of the Glenns Ferry Formation of the upper Idaho Group in the Nampa-Caldwell area, are the major water-producing aquifers in a large part of Canyon County (Anderson and Wood, 1981). The coarse-grained sediments in this zone produce water in excess of 2,000 gallons per minute (gpm).

The delineated source water assessment area for the Cloverdale Montessori School can best be described as an eastward trending corridor approximately three and one-half miles long and one-quarter mile wide (Figure 2a, page 19). The actual data used by BARR Engineering in determining the source

water zones of contribution are available from DEQ upon request.

Section 4. Susceptibility Analysis

The water system's susceptibility to contamination was ranked as high, moderate, or low risk according to the following considerations: hydrologic characteristics, physical integrity of the well, land use characteristics, and potentially significant contaminant sources. The susceptibility rankings are specific to a particular potential contaminant or category of contaminants. Therefore, a high susceptibility rating relative to one potential contaminant does not mean that the water system is at the same risk for all other potential contaminants. The relative ranking that is derived for each well is a qualitative, screening-level step that, in many cases, uses generalized assumptions and best professional judgement. Attachment B (pages 22-23) contains the susceptibility analysis worksheets. The following summaries describe the rationale for the susceptibility ranking.

Hydrologic Sensitivity

The hydrologic sensitivity of a well is dependent upon four factors: 1) the surface soil composition, 2) the material in the vadose zone (region between the land surface and the water table), 3) the depth to first ground water, and 4) the presence of a 50-foot thick impermeable zone above the production interval of the well. Slowly draining fine-grained soils such as silt and clay typically are more protective of ground water than coarse-grained soils such as sand and gravel.

For the Cloverdale Montessori School, regional soil information indicates the presence of moderate to well draining soils in the vicinity. These soil types, in general, provide less protection to the system by allowing for a more rapid downward movement of contaminants in the unlikely event of a spill or release within the delineated region.

The hydrologic sensitivity is high for the well (Table 2, page 12). The elevated rating can be attributed to the fact that DEQ was unable to obtain an applicable well log for the Cloverdale Montessori School. Well logs typically contain valuable information regarding hydrologic characteristics beneath ground surface. As a result, the high hydrologic sensitivity rating is somewhat conservative. Several well logs were located for wells in the immediate vicinity of the Cloverdale Montessori School. These logs indicate that the vadose zone is composed primarily of sand and gravel with small intrusions of brown clay. There was no indication of an aquitard, or low permeability clay layer, that could help to impede or trap any leaching contaminants.

Well Construction

Well construction directly affects the ability of the well to protect the aquifer from contaminants. System construction scores are reduced when information shows that potential contaminants will have a more difficult time reaching the intake of the well. Lower scores imply a system is less vulnerable to contamination. For example, if the well casing and annular seal both extend into a low permeability unit, then the possibility of contamination is reduced and the system construction score goes down. If the highest production interval is more than 100 feet below the water table, then the system is considered to have a better buffering capacity. In addition, if the wellhead and surface seal are maintained to standards, as outlined in sanitary surveys, then contamination down the well bore is less

probable. Also, if the wellhead is protected from surface flooding and is outside the 100-year floodplain, then the likelihood of contamination from surface events is reduced.

According to the 1997 Sanitary Survey conducted by the Central District Health Department, the well was drilled in March of 1997. Furthermore, the well is 120 feet deep, with a six inch casing to the same depth. A submersible ¾ horsepower pump is set at 63 feet below ground surface. This report also indicated that the well's surface seal is in compliance and should serve as an adequate initial barrier to surface pollutants.

A well log was unavailable for the Cloverdale Montessori School, so therefore, some data concerning the intricacies of the well are not known. As a result, the Cloverdale Montessori School's susceptibility score was slightly increased. Therefore, the system construction score rated moderate (Table 2, page 12).

Potential Contaminant Source and Land Use

In terms of the potential contaminant/land use score, the well rated moderate for IOCs (i.e. nitrates, arsenic), VOCs (i.e. petroleum products), and SOCs (i.e. pesticides) and low for microbial contaminants (i.e. bacteria). These scores result, in part, because of numerous potential contaminant sources within the designated drinking water capture zone (Table 1, page 21).

The predominant land uses within the delineated region are urban and commercial. These areas are subject to ground water pollution from several sources, including storm water runoff, improper household hazardous waste disposal methods, and industrial pollution discharges, to name a few. These land uses collectively tended to increase the susceptibility scores for the Cloverdale Montessori School.

Furthermore, the drinking water capture zone resides within a DEQ designated Group 1 Priority Area for nitrates and the VOC perchloroethylene (perc). The water system may be subject to these contaminants since they are fairly prevalent in the region. These areas, in turn, slightly increased the susceptibility scores.

Final Susceptibility Ranking

A detection above a drinking water standard MCL, any detection of a VOC or SOC, or a repeat detection of total coliform bacteria or fecal coliform bacteria at the wellhead will automatically give a high susceptibility rating to a well despite the land use of the area because a pathway for contamination already exists. Additionally, potential contaminant sources within 50 feet of a wellhead will lead to an automatically high susceptibility rating. Hydrologic sensitivity and system construction scores are heavily weighted in the final scores. Having multiple potential contaminant sources in the 0- to 3-year time of travel zone (Zone 1B) and the presence of agricultural land contribute greatly to the overall ranking.

The Cloverdale Montessori School water system may have rated a lower overall susceptibility if a well log could have been incorporated into the susceptibility analysis. Instead, the system rated a high overall susceptibility to all classes of contaminants (Table 2, page 12). The water system automatically rated high for microbial contaminants because of the recent repeat detections of bacteria within the well bore.

Table 2. Summary of the Cloverdale Montessori School Susceptibility Evaluation

	Susceptibility Scores ¹									
	Hydrologic Sensitivity	Contaminant Inventory			System Construction	Final Susceptibility Ranking				
Well		IOC	VOC	SOC	Microbials		IOC	VOC	SOC	Microbials
Well #1	Н	M	M	M	L	M	Н	Н	Н	H*

 $^{1}H = High Susceptibility, M = Moderate Susceptibility, L = Low Susceptibility,$

IOC = inorganic chemical, VOC = volatile organic chemical, SOC = synthetic organic chemical

H* = well automatically rated high because of several recent repeat bacteria detections within the well bore

Susceptibility Summary

A high hydrologic sensitivity and moderate system construction combined to give the well a high overall rating for IOCs, VOCs, and SOCs even though few potential contaminant sources exist in the 3-year TOT zone. The system automatically rated a high overall susceptibility score for microbes because of several recent repeat detections of bacteria in routine drinking water samples collected from the well bore. No VOCs or SOCs have ever been detected in the well water. However, the delineated source water area does reside within DEQ designated Group 1 Priority Areas for nitrates and perc. The system may be vulnerable to these contaminants since they are fairly prevalent in the region.

Section 5. Options for Drinking Water Protection

The susceptibility assessment should be used as a basis for determining appropriate new protection measures or re-evaluating existing protection efforts. No matter what the susceptibility ranking a source receives, protection is always important. Whether the source is currently located in a "pristine" area or an area with numerous industrial and/or agricultural land uses that require surveillance, the way to ensure good water quality in the future is to act now to protect valuable water supply resources.

An effective drinking water protection program is tailored to the particular local drinking water protection area. A community with a fully developed drinking water protection program will incorporate many strategies. For the Cloverdale Montessori School, drinking water protection activities should first focus on continued maintenance of the sanitary seal and distribution system. Actions should also be taken to keep a 50-foot radius circle clear around the wellhead. If the system should need to expand in the future, new well sites should be located in areas with as few potential sources of contamination as possible, and the site should be reserved and protected for this specific use.

Any contaminant spills occurring on Cloverdale Drive should be monitored and dealt with expeditiously. Because a portion of the ground water capture zone is outside the direct jurisdiction of the Cloverdale Montessori School, the creation of partnerships with state and local agencies and industry groups are critical to the success of drinking water protection. Should microbial contamination continue to be a problem, appropriate disinfection practices would need to be implemented to ensure the health of the Cloverdale Montessori School residents.

The system may also want to further investigate any actions that need to be taken to achieve

compliance with the new arsenic rule, effective in 2006. A proactive role will help to minimize complications in the future. Additionally, because the delineation passes through a Group 1 Priority Area for perc, the system may want to continually monitor for this pollutant. Perc has been linked with kidney and liver cancer in laboratory animals, and may be a human carcinogen.

Due to the time involved with the movement of ground water, drinking water protection activities should be aimed at long-term management strategies even though these strategies may not yield results in the near term. A strong public education program should be a primary focus of any drinking water protection plan, especially since the delineation contains some urban and residential land uses. Public education topics could include proper lawn care practices, household hazardous waste disposal methods, and the importance of water conservation to name but a few.

There are multiple resources available to help communities implement protection programs, including the Drinking Water Academy of the U.S. EPA. In addition, because a transportation corridor (Cloverdale Drive) passes through the delineation, the Idaho Department of Transportation should be involved in any protection measures. Drinking water protection practices dealing with agriculture should be coordinated with the Idaho State Department of Agriculture, the Soil Conservation Commission, the Ada County Soil Conservation District, and the Natural Resources Conservation Service.

A community must incorporate a variety of strategies in order to develop a comprehensive drinking water protection plan, be they regulatory in nature (i.e. zoning, permitting) or non-regulatory in nature (i.e. good housekeeping, public education, specific best management practices). For assistance in developing protection strategies please contact the Boise Regional Office of the Idaho Department of Environmental Quality or the Idaho Rural Water Association.

Assistance

Public water supplies and others may call the following DEQ offices with questions about this assessment and to request assistance with developing and implementing a local protection plan. In addition, draft protection plans may be submitted to the DEQ office for preliminary review and comments.

Boise Regional DEQ Office (208) 373-0550

State DEO Office (208) 373-0502

Website: http://www2.state.id.us/deq

Water suppliers serving fewer than 10,000 persons may contact John Bokor, Idaho Rural Water Association, at 1-800-962-3257 for assistance with drinking water protection (formerly known as wellhead protection) strategies.

POTENTIAL CONTAMINANT INVENTORY LIST OF ACRONYMS AND DEFINITIONS

<u>AST (Aboveground Storage Tanks)</u> - Sites with aboveground storage tanks.

<u>Business Mailing List</u> – This list contains potential contaminant sites identified through a yellow pages database search of standard industry codes (SIC).

<u>CERCLIS</u> – This includes sites considered for listing under the Comprehensive Environmental Response Compensation and Liability Act (CERCLA). CERCLA, more commonly known as ASuperfund≅ is designed to clean up hazardous waste sites that are on the national priority list (NPL).

<u>Cyanide Site</u> – DEQ permitted and known historical sites/facilities using cyanide.

<u>Dairy</u> – Sites included in the primary contaminant source inventory represent those facilities regulated by Idaho State Department of Agriculture (ISDA) and may range from a few head to several thousand head of milking cows.

<u>Deep Injection Well</u> – Injection wells regulated under the Idaho Department of Water Resources generally for the disposal of stormwater runoff or agricultural field drainage.

Enhanced Inventory – Enhanced inventory locations are potential contaminant source sites added by the water system. These can include new sites not captured during the primary contaminant inventory, or corrected locations for sites not properly located during the primary contaminant inventory. Enhanced inventory sites can also include miscellaneous sites added by the Idaho Department of Environmental Quality (DEQ) during the primary contaminant inventory.

Floodplain - This is a coverage of the 100year floodplains.

<u>Group 1 Sites</u> – These are sites that show elevated levels of contaminants and are not within the priority one areas.

<u>Inorganic Priority Area</u> – Priority one areas where greater than 25% of the wells/springs show constituents higher than primary standards or other health standards.

<u>Landfill</u> – Areas of open and closed municipal and non-municipal landfills.

<u>LUST (Leaking Underground Storage Tank)</u> – Potential contaminant source sites associated with leaking underground storage tanks as regulated under RCRA.

<u>Mines and Quarries</u> – Mines and quarries permitted through the Idaho Department of Lands.)

<u>Nitrate Priority Area</u> – Area where greater than 25% of wells/springs show nitrate values above 5mg/l.

NPDES (National Pollutant Discharge Elimination System) – Sites with NPDES permits. The Clean Water Act requires that any discharge of a pollutant to waters of the United States from a point source must be authorized by an NPDES permit.

Organic Priority Areas – These are any areas where greater than 25 % of wells/springs show levels greater than 1% of the primary standard or other health standards.

<u>Recharge Point</u> – This includes active, proposed, and possible recharge sites on the Snake River Plain.

RICRIS – Site regulated under <u>Resource Conservation</u> <u>Recovery Act (RCRA)</u>. RCRA is commonly associated with the cradle to grave management approach for generation, storage, and disposal of hazardous wastes.

SARA Tier II (Superfund Amendments and Reauthorization Act Tier II Facilities) – These sites store certain types and amounts of hazardous materials and must be identified under the Community Right to Know Act.

Toxic Release Inventory (TRI) – The toxic release inventory list was developed as part of the Emergency Planning and Community Right to Know (Community Right to Know) Act passed in 1986. The Community Right to Know Act requires the reporting of any release of a chemical found on the TRI list.

<u>UST (Underground Storage Tank)</u> – Potential contaminant source sites associated with underground storage tanks regulated as regulated under RCRA.

Wastewater Land Applications Sites – These are areas where the land application of municipal or industrial wastewater is permitted by DEQ.

<u>Wellheads</u> – These are drinking water well locations regulated under the Safe Drinking Water Act. They are not treated as potential contaminant sources.

NOTE: Many of the potential contaminant sources were located using a geocoding program where mailing addresses are used to locate a facility. Field verification of potential contaminant sources is an important element of an enhanced inventory.

Where possible, a list of potential contaminant sites unable to be located with geocoding will be provided to water systems to determine if the potential contaminant sources are located within the source water assessment area.

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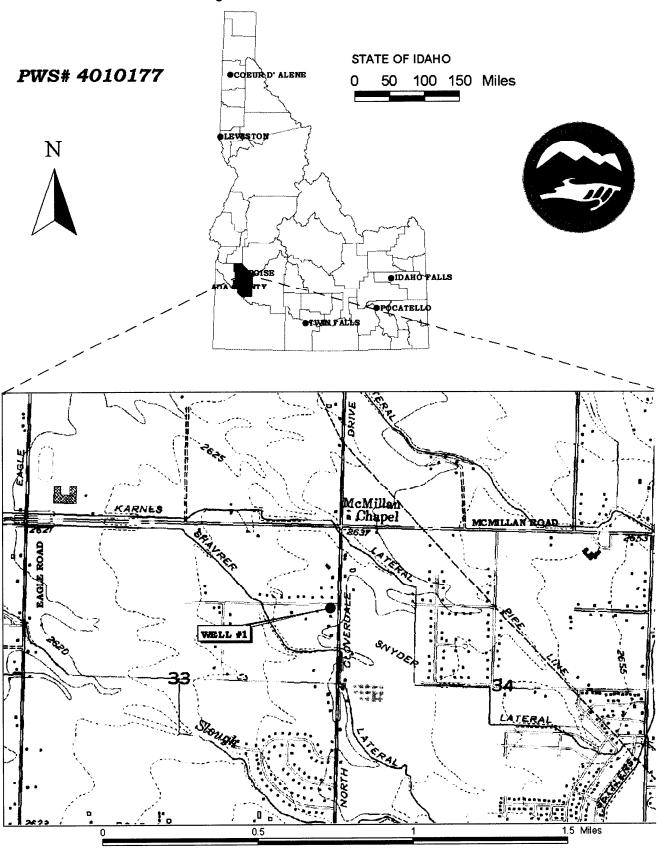
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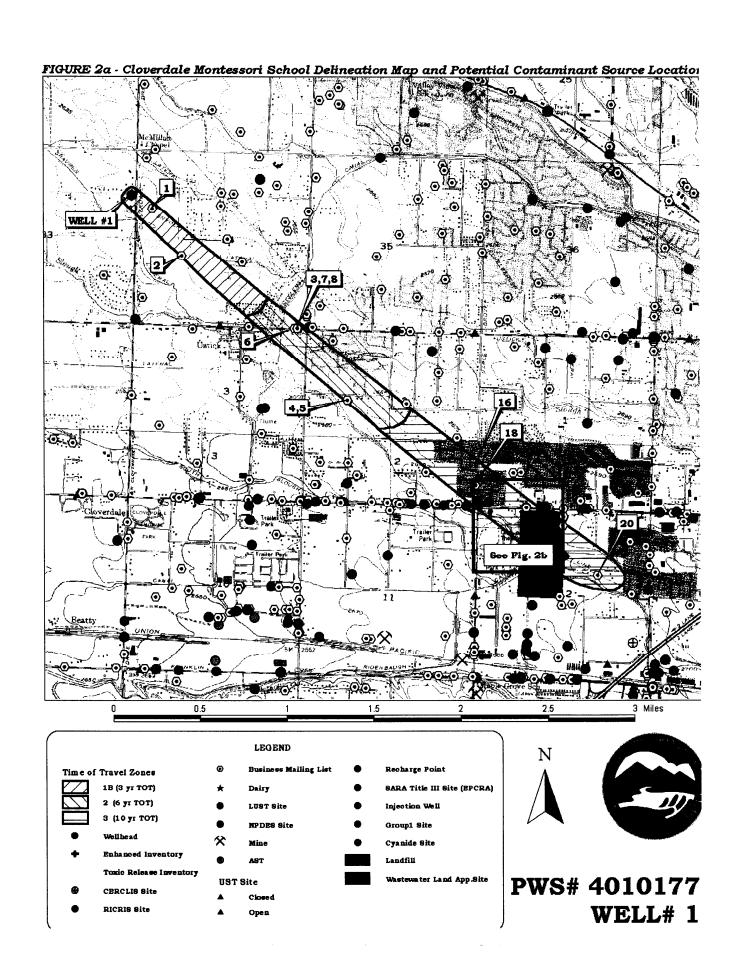
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Attachment A

Delineation Figures and Potential Contaminant Source Table for the Cloverdale Montessori School

FIGURE 1: Location of the Cloverdale Montessori School





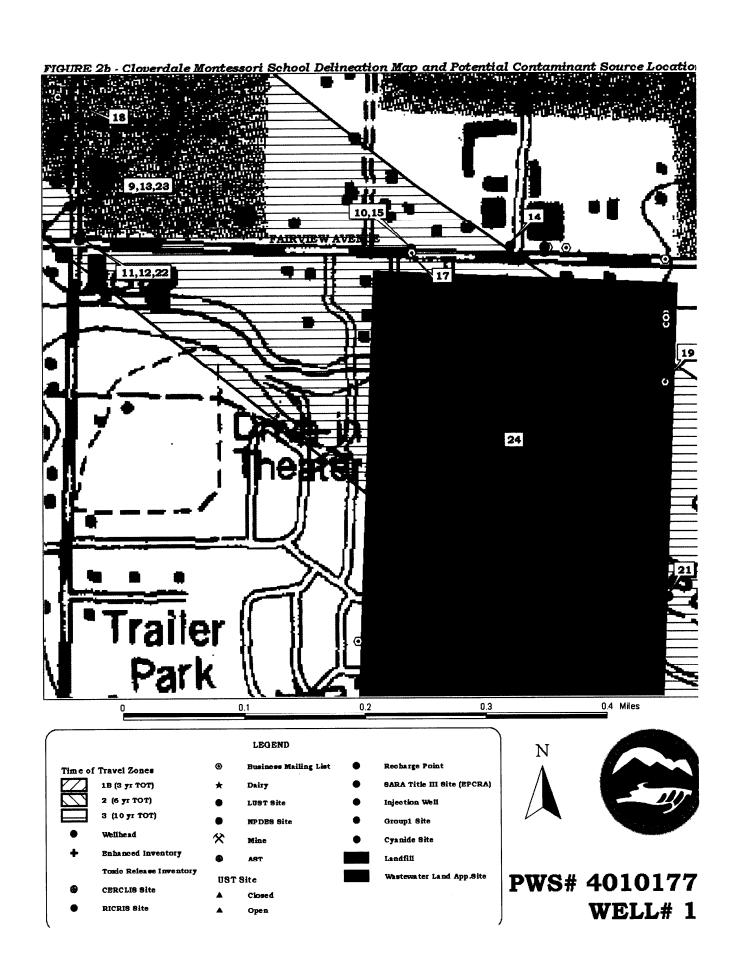


Table 1. Cloverdale Montessori School Potential Contaminant Inventory

SITE#	Source Description ¹	TOT Zone ² (years)	Source of Information	Potential Contaminants ³		
	Cloverdale Drive	0-3	GIS Map	IOC, VOC, SOC, Microbes		
	Irrigation Canal	0-3	GWUDI field survey	IOC, VOC, SOC, Microbes		
1	Lawn Maintenance Company	0-3	Business Mailing List	IOC, VOC, SOC		
2	Janitorial Supplier	0-3	Business Mailing List	IOC, VOC, SOC		
3,7,8	SARA Site/UST Site Gas Station	3-6	Database Search	IOC, VOC, SOC		
4	Seeds & Bulbs-Wholesale	3-6	Business Mailing List	IOC, SOC		
5	Identification Card Service	3-6	Business Mailing List	N/A		
6	Automobile Parts & Supplies- Retail	3-6	Business Mailing List	IOC, VOC, SOC		
9,13,23	SARA Site/LUST/UST Utility Company	6-10	Database Search	IOC, VOC, SOC		
10,15	Closed LUST/UST Site- Automobile Dealership	6-10	Database Search	VOC, SOC		
11,12,22	SARA Site/LUST/UST Gas Station	6-10	Database Search	IOC, VOC, SOC		
14	Closed UST Site-Automobile Shop	6-10	Database Search	VOC, SOC		
16	Closed UST-General Contractor	6-10	Database Search	VOC, SOC		
17	Used Automobile Dealer	б-10	Business Mailing List	IOC, VOC, SOC		
18	Home Improvement Construction	6-10	Business Mailing List	IOC, VOC, SOC		
19	Dry Cleaner	6-10	Business Mailing List	VOC		
20	Lawn Maintenance Company	6-10	Business Mailing List	IOC, VOC, SOC		
21	RCRIS Site-Home Improvement Warehouse	6-10	Database Search	IOC, VOC, SOC		
24	WLAP Site-Municipal Wastewater	6-10	Database Search	IOC, SOC		

NOTE: The site number in this table corresponds to Figures 2a & 2b, pages 19-20.

Find Source Description definitions on page 14

Tot = time-of-travel (in years) for a potential contaminant to reach the wellhead

Toc = inorganic chemical, Voc = volatile organic chemical, Soc = synthetic organic chemical

Attachment B

Cloverdale Montessori School Susceptibility Analysis Worksheet

The final scores for the susceptibility analysis were determined using the following formulas:

- 1) VOC/SOC/IOC Final Score = Hydrologic Sensitivity + System Construction + (Potential Contaminant/Land Use x 0.2)
- 2) 2) Microbial Final Score = Hydrologic Sensitivity + System Construction + (Potential Contaminant/Land Use x 0.375)

Final Susceptibility Scoring:

- 0-5 Low Susceptibility
- 6 12 Moderate Susceptibility
- ≥ 13 High Susceptibility

Well# • WELL #1

Ground Water Susceptibility Report	Public Water System Nu Public Water System Nu		MONTESSORI SCHOOL				: WELL #1 2 2:55:58 P
. System Construction				SCORE			
	Drill Date	J	лкиоми				
	Driller Log Available		NO				
Sanitary Survey (if yes, indica			YES	1997			
	construction standards		NO	1			
	surface seal maintained		YES	0			
Casing and annular seal extend to			NO	2			
Highest production 100 feet be Well located outside the	elow static water level ne 100 year flood plain		NO YES	1 0			
		Total	System Construction Score	4			
Hydrologic Sensitivity							
	y to moderately drained		NO	2			
Vadose zone composed of gravel, fra	actured rock or unknown		YES	1			
Depth to	first water > 300 feet		NO	1			
Aquitard present with > 50 fee	et cumulative thickness		NO	2			
			Total Hydrologic Score	6			
				IOC	VOC	SOC	Microbial
Potential Contaminant / Land Use - 2	ONE 1A			Score	Score	Score	Score
			/an				
	Land Use Zone 1A	URBAN	/COMMERCIAL	2	2	2	2
707 W00 000 W	Farm chemical use high		NO	0	0	0	
IOC, VOC, SOC, or Microb			YES	NO	NO	NO	YES
	Total Potenti	al Contaminant Sourc	e/Land Use Score - Zone 1A	2	2	2	2
Potential Contaminant / Land Use	ZONE 1B						
Contaminant sources prese	ent (Number of Sources)		YES	4	4	4	2
(Score = # Sources X	2) 8 Points Maximum			8	8	8	4
Sources of Class II or III lead	cheable contaminants or		YES	2	2	2	
	4 Points Maximum			2	2	2	
Zone 1B contains or int	ercepts a Group 1 Area		YES	2	2	0	0
	Land use Zone 1B	Less Than 25%	Agricultural Land	0	0	0	0
	Total Potential	Contaminant Source	/ Land Use Score - Zone 1B	12	12	10	4
Potential Contaminant / Land Use	ZONE II						
Conta	minant Sources Present		YES	2	2	2	
Sources of Class II or III lead			YES	ī	ī	1	
	Land Use Zone II	Less than 25%	Agricultural Land	ō	ō	ō	
	Potential	Contaminant Source /	Land Use Score - Zone II	3	3	3	0
Potential Contaminant / Land Use -	ZONE III						
Cont	aminant Source Present		YES	1	1	1	
Sources of Class II or III lead	heable contaminants or		YES	1	1	ī	
Is there irrigated agricultural land	s that occupy > 50% of		NO	0	0	0	
	Total Potential	Contaminant Source /	Land Use Score - Zone III	2	2	2	0
Cumulative Potential Contaminant /				19	19	17	6
. Final Susceptibility Source Score				14	14	13	12
Pinal Wall Panking				7741-			
. Final Well Ranking				High	High	High	High